

WILKINSON ) BARKER ) KNAUER ) LLP

2300 N STREET, NW  
SUITE 700  
WASHINGTON, DC 20037-1128  
TEL 202.783.4141  
FAX 202.783.5851  
www.wbklaw.com

ORIGINAL

RECEIVED

November 9, 2000

NOV 9 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445-12th St. TW-A235  
Washington, DC 20554

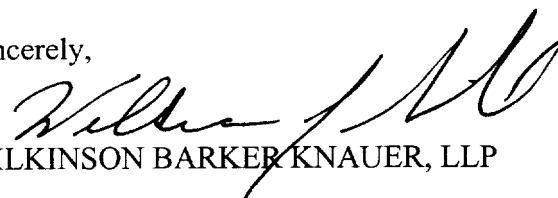
Re: *Cellular Phone of Kentucky, Inc.'s, Report on E911 Phase II  
Implementation*

Dear Ms. Salas:

Pursuant to Section 20.18(i) of the FCC's rules, 47 C.F.R. 20.18(i), Cellular Phone of Kentucky, Inc., ("KY6"), hereby reports its plans for implementing Phase II enhanced 911 ("E911") service.

Please do not hesitate to contact the undersigned with any questions you may have at (202)783-4141.

Sincerely,

  
WILKINSON BARKER KNAUER, LLP

By: William J. Sill  
Laura A. Schink

Enclosures

No. of Copies rec'd 044  
List ABCDE

Before the  
Federal Communications Commission  
Washington, D.C. 20554

**RECEIVED**

**NOV 9 2000**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

In the Matter of )  
)  
Revision of the Commission's Rules to Ensure ) CC Docket No. 94-102  
Compatibility with Enhanced 911 Emergency )  
Calling Systems )  
)  
Phase II Implementation Report ) TRS No. 806505

To: The Commission

## **REPORT ON ENHANCED 911 PHASE II IMPLEMENTATION**

Pursuant to Section 20.18(i) of the FCC's rules, 47 C.F.R. 20.18(i), Cellular Phone of Kentucky, Inc., ("KY6") hereby reports its plans for implementing Phase II enhanced 911 ("E911") service. This report is responsive to the requirements set forth in the FCC's rules and is organized in accordance with the Wireless Telecommunications Bureau's guidance.<sup>1/</sup>

### **I. BACKGROUND/CONTACT INFORMATION**

#### **A. Licensee Name**

Cellular Phone of Kentucky, Inc.

#### **B. Contact Information**

Correspondence or other inquiries regarding this report should be addressed to:

Kelly Ramsey  
6915 Harrodsburg Road  
Nicholasville, KY 40356-8722  
(859) 885-5500

---

<sup>1/</sup> Public Notice, *Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification*, CC Docket No. 94-102, DA 00-2099 (rel. Sept. 14, 2000).

## **II. E911 PHASE II LOCATION TECHNOLOGY INFORMATION**

### **A. Type of Technology**

Based upon current technology and vendor representations received in response to multiple requests for information and requests for proposals KY6 currently intends to test and implement a handset-based automatic location information (“ALI”) technology throughout its service territory. However, KY6 will also continue to explore its options to utilize a network-based solution. KY6 reserves the right to change its plan and select an alternative ALI technology, as permitted under the Commission’s rules.<sup>2/</sup>

### **B. Testing and Verification**

Currently, KY6 is considering multiple vendors and reviewing the technology that is available from them. As the E911 Phase II technology and equipment has not been concretized, KY6 cannot make a final determination as to what technology and equipment it will use. Thus, KY6 cannot finalize its verification plans. However, KY6 intends to verify the performance and operation of any installed ALI solution during installation and commissioning of the technology into the existing network. KY6 intends to seek vendor participation in the planning and verification testing stages. As soon as KY6 reaches a decision and selects its vendor, it will work closely with them to obtain greater detail on planning and verification stages.

### **C. Implementation Details and Schedule**

KY6 is currently working within the following timeframe for implementation of an ALI handset-based solution that will comply with the FCC’s E911 Phase II directives:

1<sup>st</sup> Quarter 2001 – Technology evaluation and vendor negotiations for ALI compliant handsets

---

<sup>2/</sup> See *Third Report and Order*, 14 FCC Rcd. 17388, ¶ 89 (1999).

2<sup>nd</sup> Quarter 2001 – Technology selection and vendor selection. Equipment orders placed.

3<sup>rd</sup> Quarter 2001 – ALI installation and commissioning. Verification trials.

4<sup>th</sup> Quarter 2001 – Compliance with E911 Phase II ALI handset requirements.

It must be noted that KY6's timeline is dependant on several external factors, which may impact the success or achievements made. For example, the co-operation and readiness of the local PSAP and the availability date of E911 Phase II compliant equipment will either assure that the deadline is made or missed.

#### **D. PSAP Interface**

KY6 will work closely with the PSAPs in its reliable service area to coordinate the implementation, and provide Phase II E911. KY6 intends to implement an ALI solution for its network that will comply with the Telecommunications Industry Association (TIA) issued interim standard, TIA J-STD-036, Enhanced Wireless 9-1-1 Phase II. The current issue was released in June 2000.

KY6 will be seeking vendor compliance with this standard for the PSAP interfaces. This standard specifically addresses the requirements of carriers to report position information to emergency services systems, as mandated by the FCC.

#### **E. Existing Handsets**

KY6 has no immediate plans to implement a handset retrofit program to replace existing customer owned non-ALI handsets with ALI compatible handsets. Rather, existing customers will be able to purchase ALI compliant handsets for use with their existing active account. However, to the extent that handset retrofitting is economical and available KY6 considers it to be an option.

#### **F. Location of Non-Compatible Handsets**

KY6 will use its best efforts to provide location cell site information utilizing Phase I technology. KY6 will continue to review any vendor's plan for providing ALI information compatibility for ALI non-compatible handsets but at this time has no plans to implement a technology solution for non-compatible handsets. KY6 believes that by the time the land line networks and the designated PSAP's facilities have been upgraded, the number of non-compatible handsets will be significantly reduced by the introduction of compatible handsets into the marketplace.

#### **G. Other Information**

KY6 notes that PSAPs must be "capable of receiving and utilizing the data elements associated with the service," and have a cost recovery mechanism in place before KY6 is obligated to deploy Phase II service in a market.<sup>3/</sup> To date, KY6 has not received any E911 Phase II requests from PSAPs. In fact, KY6 has not received any request for E911 Phase I service.

On November 13, 2000, KY6 will be attending a meeting between carriers and public safety representatives hosted by the Governor's Office of Technology and the Communications Mobile Radio Service Emergency Board, regarding the terms and conditions under which Phase I will be provided. While the agenda for the meeting centers around Phase I issues, Phase II will also be discussed.

---

<sup>3/</sup> 47 C.F.R. § 20.18(j).

### III. CONCLUSION

As discussed herein, the instant report is submitted pursuant to the requirements set forth in Section 20.18(i) of the FCC's rules. In the event that additional information is requested, KY6 will consult with FCC staff to discuss appropriate means of ensuring that business proprietary information, is not publicly disclosed.

Respectfully submitted,

By:

  
\_\_\_\_\_  
Kelly Ramsey  
General Manager

November 8, 2000